

JASON M. FRIERSON
 United States Attorney
 Nevada Bar No. 7709
 JULIE A.K. CUMMINGS, Hawai‘i Bar No. 10635
 Special Assistant United States Attorney
 Office of the General Counsel
 Social Security Administration
 6401 Security Boulevard
 Baltimore, MD 21235
 Telephone: 855-601-2479 ext. 31387
 Facsimile: 415-744-0134
 E-Mail: Julie.Cummings@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JEFFREY LYNN HOLTAN,

Plaintiff,

v.

KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,

Defendant.

)
 Case No. 2:22-cv-01222-VCF

**UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff’s Motion for Reversal and/or Remand (Dkt. No. 20), currently due on December 12, 2022, by 30 days, through and including January 11, 2023. Defendant further requests that all subsequent deadlines set forth in the Court’s scheduling order (Dkt. No. 17) be extended accordingly.

This is Defendant’s first request for an extension of time. Good cause exists for this extension for the following reasons. The undersigned attorney for Defendant (Julie A.K. Cummings) was just this week reassigned this case due to the pressing workload of her colleague, Michonne Omo. The

undersigned cannot complete the brief in the present case by December 12, 2022, due to her own full caseload. Specifically, the undersigned presently has 25 pending matters at various stages of litigation and requires additional time to sequence the newly reassigned case into her schedule.

Additional time is required to review the record, to evaluate the numerous issues raised in Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

On December 6, 2022, counsel for Defendant conferred with Marc V. Kalagian, counsel Plaintiff, who has no opposition to this motion.

It is therefore respectfully requested that Defendant be granted an extension of time to respond to Plaintiff's Motion for Reversal and Remand, through and including January 11, 2023.

Dated: December 8, 2022

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ Julie A.K. Cummings
JULIE A.K. CUMMINGS
Special Assistant United States Attorney

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 12-9-2022

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD, 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** to be served upon the following by:

CM/ECF:

Marc V Kalagian
marc.kalagian@rksslaw.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 8, 2022

/s/ Julie A.K. Cummings
JULIE A.K. CUMMINGS
Special Assistant United States Attorney